

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

FIC, L.P., individually, and on behalf of all others similarly situated,

Plaintiff,

v.

BEAR STEARNS ASSET MANAGEMENT INC., RALPH CIOFFI, RAYMOND McGARRIGAL, MATTHEW TANNIN, BEAR STEARNS COMPANIES INC., BEAR STEARNS & CO. INC., WALKERS FUND SERVICES LIMITED, SCOTT LENNON, and MICHELLE WILSON-CLARKE,

No. 07 Civ. 11633 (AKH)

ECF Case

Defendants,

and

BEAR STEARNS HIGH-GRADE STRUCTURED CREDIT STRATEGIES ENHANCED LEVERAGE FUND, L.P.,

Nominal Defendant.

**NOTICE OF MOTION FOR FINAL APPROVAL OF SETTLEMENT  
AND AN AWARD OF ATTORNEYS' FEES AND EXPENSES**

PLEASE TAKE NOTICE, that upon the Stipulation of Settlement dated December 22, 2012; the Court's Preliminary Approval Order dated February 8, 2012; the accompanying Joint Declaration of James J. Sabella and James S. Notis and the exhibits thereto; the accompanying memorandum of law; and all prior papers and proceedings herein, Plaintiff FIC, L.P. will move this Court, before the Honorable Alvin K. Hellerstein, at the United States Courthouse, 500 Pearl Street, Courtroom 14D, New York, New York 10007 on March 29, 2012 at 4:00 p.m. or as soon thereafter as counsel can be heard, pursuant to Rule 23.1(c) of the Federal Rules of Civil

Procedure and Local Civil Rule 23.1.1 of the Rules of this Court, for an Order: (i) approving the Settlement as fair, reasonable and adequate and directing the parties to consummate the Settlement in accordance with the terms of the Stipulation of Settlement; (ii) awarding attorneys' fees and expenses to Plaintiff's counsel; and (iii) granting such other relief as the Court deems just and proper

PLEASE TAKE FURTHER NOTICE, that pursuant to the Court's Preliminary Approval Order, objections, if any, to the Settlement or the requested award of attorneys' fees and expenses must be served and filed in accordance with the terms of such Order on or before March 9, 2012.

Dated: February 28, 2012

**GARDY & NOTIS, LLP**

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